

Date 16<sup>th</sup> March 2017

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NPF Submissions  
Forward Planning Section  
Department of Housing, Planning, Community and Local Government  
Custom House  
Dublin D01 W6X0

Dear Sir/Madam,

**Re: Consultation – Ireland 2040 National Planning Framework, Issues & Choices**

We welcome this opportunity to feed into the Department's vision for the future development of our nation.

Sustineo was set up to assist organisations in developing low carbon projects and verifying sustainability through numbers. Our work includes:

1. Climate Action Workshops for local authorities
2. Steering committee for the Irish Forum on Natural Capital
3. Member of the Irish Green Building Council

It is with this passion and expertise in moving towards a low carbon society that we are very much interested in how Ireland's environmental sustainability and quality of life is planned for.

**Response**

Ireland's climate is already changing and this is in line with regional and global trends. As you are aware, a growing global population and worldwide economy has had a devastating impact on nature – up to half of all species may be exterminated by the middle of this century, primarily caused by human activities.<sup>1</sup>

Traditional economics has generally considered impacts to nature as externalities, but it seems that we have now outgrown these old sets of rules and we can no longer ignore our environment in the context of a sustainable economy. An economy cannot function without people, and both cannot function without a healthy environment. Nobel prize-winning economists are calling our GDP figures "leprechaun economics"<sup>2</sup> as they become distorted by the large multi-national companies and aircraft leasing for example. Good GDP figures do not necessarily mean good for the people of Ireland or indeed the planet.

**Natural Capital** offers a way to bring our natural assets into economic and strategic decision making. It is an asset-based approach about making our environment, society and economy better in the long term, rather than our traditional approach – cash flow budgets designed to distribute short term happiness. Do we want better schools, better hospitals, better public

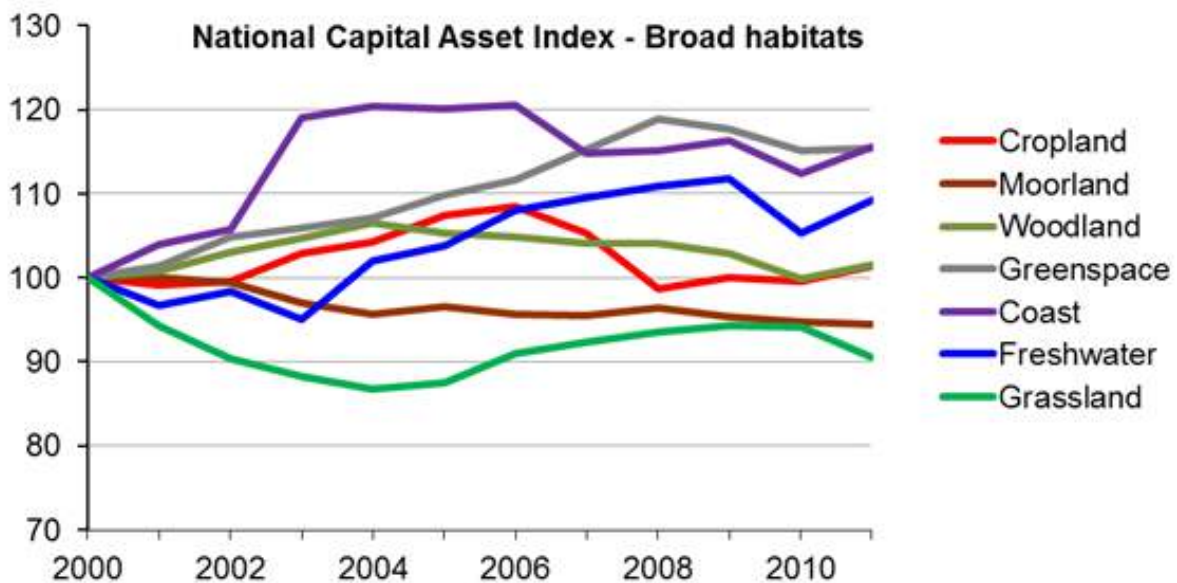
<sup>1</sup> [http://www.biodiversity.org/programs/biodiversity/elements\\_of\\_biodiversity/extinction\\_crisis/](http://www.biodiversity.org/programs/biodiversity/elements_of_biodiversity/extinction_crisis/) accessed on 15/3/17

<sup>2</sup> <http://www.independent.ie/business/irish/leprechaun-economics-irelands-26pc-growth-spurt-laughed-off-as-farcical-34879232.html> accessed on 15/3/17

transport, better environment and amenities all improving over time, or do we continue to budget for short term political cycles?

We ask that the Department of Housing, Planning, Community and Local Government liaise with the Department of Finance in making our country even better in the long term. The natural capital approach could also be used to address EU targets relating to greenhouse gas emissions and biodiversity for instance. As such, all government departments may have some hand to play in protecting “our hidden wealth”, or, our natural capital, e.g. we note that there is no mention of agriculture under climate action but would like to see involvement from the Department of Agriculture, Food and the Marine.

**Scotland** has adopted the natural capital concept by integrating a Natural Capital Asset Index into its decision-making processes. This is helping drive appropriate resources through government agencies in a structured and coherent manner as well as bringing nature into the public debate.<sup>3</sup> Not only has Scotland hit its 2020 emissions target six years early. It has now set a new more ambitious target of a 66% emissions cut within 15 years and is expecting this to cost £3bn each year. Scotland’s plan to realise this target is not just about energy efficiency and renewables, it is also about reparation of degraded peatlands which will help as a carbon sink and to realise its emissions target.



**England** has set the goal of “being the first generation to leave the natural environment of England in a better state than it inherited.” It has set up the world’s first Natural Capital Committee to provide steer to its government in this long-term direction.<sup>4</sup>

<sup>3</sup> <http://www.gov.scot/Topics/Environment/Countryside/Landusestrategy/Monitoring/Indicator5> accessed 15/3/17

<sup>4</sup> <https://www.gov.uk/government/speeches/owen-paterson-speech-to-policy-exchange> accessed on 15/3/17



**To conclude**, we welcome this public consultation on Ireland 2040 and request that you **include the Natural Capital approach** in conjunction with the Department of Finance, adopting the simple rule “**the aggregate level of natural capital should not decline**”. This acknowledges that environmental damage will always occur as a result of most development but that there must be some measure of compensation such that the overall state of our environment does not decline. Indeed, hopefully it improves.

We look forward to hearing about the next phase of development of the National Planning Framework for Ireland and would gladly provide further input if requested.

Yours faithfully,



Raoul Empey

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**P.S. Simple Definition:** Natural capital is a concept that unites the economy and the environment as allies for a sustainable future. It is defined as the planet's stocks of renewable and non-renewable resources (e.g. plants, animals, air, water, minerals, soils) that combine to yield a flow of benefits to people.